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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

NOV - 3 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Amendment of Section 73.202(b))

Table of Allotments)

FM Broadcast Stations.)

(Boulder City and)

Las Vegas, Nevada))

RM -- _____

To: Mass Media Bureau (Policy & Rules)

PETITION FOR RULE MAKING AND FOR ORDER TO SHOW CAUSE

Rock "N" Roll, Inc., licensee of FM station KRRI, Boulder City Nevada (hereinafter "KRRI"), by its attorney, hereby petitions for rule making to amend Section 73.202 of the Commission's Rules. The purpose of this petition is to alleviate interference to KRRI which is being caused by FM station KRBO, Las Vegas, Nevada.¹ Currently the two stations are separated by 400 kHz; KRRI operates on Channel 288C2, while KRBO operates on Channel 286C2. KRRI proposes to increase the spacing to 600 kHz.

KRRI has been operating on its frequency for a number of years. KRBO, a new station, commenced broadcast operations only a few weeks ago. At that time, KRRI began to receive unsolicited complaints from listeners that their reception of KRRI was interfered with by KRBO. KRRI located the area of interference, and determined that it lies well within its 1

¹ By filing this pleading, KRRI does not withdraw any of its other pleadings now pending before the Commission regarding KRBO.

mV/m contour; part of the area of interference is even within its 3.16 mV/m contour. On October 29, 1993, KRRI reported this interference to the Commission and requested that the Commission order KRBO to take whatever steps might be necessary to eliminate this harmful interference. A copy of KRRI's request is attached hereto.

KRRI believes that the interference is exacerbated by the fact that KRRI and KRBO are separated by only 400 kHz. Increasing the separation may reduce the interference. KRRI has thus sought to determine whether frequency shifts could be possible.

KRRI first looked to see if it could move to Channel 289C2, or if KRBO could change to Channel 285C2. It appears that neither of these alternatives are possible, for they are short-spaced to existing stations. However, KRRI and KRBO could make simultaneous moves which would result in increasing the frequency separation between them. KRRI could move to Channel 286C2 and KRBO could move to Channel 289C2 consistent with all current spacing rules. Neither station would have to change its transmitter site. See the attached spacing study prepared by Dataworld. With these changes in frequency, the stations will be separated by 600 kHz, and the interference KRBO causes to KRRI should be greatly reduced, if not eliminated. No other changes to the Table of Allotments will be required.

It is KRBO's responsibility to resolve the interference

it is causing to KRRI. KRRI will receive no benefit from this change of channels, other than relief from interference. Thus, KRBO should be required to reimburse KRRI for the reasonable and prudent costs it will incur in making this frequency change.

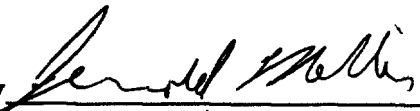
Accordingly, section 73.202(b) of the rules should be amended as follows:

<u>CITY</u>	<u>CURRENT</u>	<u>PROPOSED</u>
Boulder City, Nevada	288C2	286C2
Las Vegas, Nevada	286C2	289C2

In addition, the Commission should issue an Order to Show Cause why the frequency of KRBO should not be changed as above.

Respectfully submitted,

Rock "N" Roll, Inc.

By 
Jerrold Miller
Its Attorney

November ³/₂, 1993

Miller & Miller, P.C.
P.O. Box 33003
Washington, DC 20033

DERROLD D. MILLER
SAMUEL MILLER
JOHN S. NEELY

LAW OFFICES
MILLER & MILLER, P. C.
SUITE 760
1990 M STREET, NW
WASHINGTON, DC 20036
(202) 785-2720

MAILING ADDRESS:
P.O. BOX 33003
WASHINGTON, DC 20033

October 29, 1993

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OCT 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Stop Code - 1800B3
William Caton, Acting Secretary
Federal Communications Commission
Washington, DC 20554

re: KRBO(FM), Las Vegas, Nevada

Dear Mr. Caton:

This letter is written on behalf of FM station KRRI, Boulder City, Nevada.¹ KRRI operates on a frequency of 105.1 MHz, as a Class C2 facility. Within the past few weeks, FM station KRBO, Las Vegas, Nevada, began operations, pursuant to program test authority, on its assigned frequency of 105.5 MHz. Immediately upon the commencement of KRBO's broadcast operations, KRRI began to receive unsolicited calls complaining of an inability to receive KRRI due to interference from KRBO.

KRRI asked those calling the station to provide their names and the locations where they experienced the interference. The calls are summarized on the attached pages. The locations are plotted on the attached map. As is readily seen, the interference occurs in an area well within KRRI's 1 mV/m contour, with a large number of complaints identifying locations within KRRI's 3.16 mV/m (city-grade) contour.

It is clear Commission policy that FM stations are to be protected from interference within their service area. Here, KRRI is receiving interference from KRBO well within its service area, even within its city-grade contour. The Commission must take immediate remedial action to eliminate this interference.

Section 73.1620(b) of the Commission's rules explicitly provides that the Commission may revoke or suspend program tests by any station in order to resolve instances of objectionable interference. In the past, the Commission has ordered FM stations to reduce power from that initially authorized when unforeseen interference has occurred.

¹ The matter raised herein is separate and apart from KRRI's objection to the grant of KRRI's modification application, which has never been addressed by the Commission.

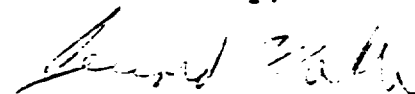
William Caton, Acting Secretary
October 29, 1993
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Some years ago, approximately five Class C FM stations, including KEEY-FM, were granted construction permits to transmit from the IDS building in Minneapolis, Minnesota. When they began broadcasting, the Commission received complaints of interference to two other area FM stations. As a result, the Commission ordered the stations atop the IDS building to halve their power until the interference could be cured.

Similarly, the Commission must take action here. From the record of complaints, it is abundantly clear that KRBO is the cause of destructive interference within the coverage area of KRRI. KRBO must either cease operations, or take other necessary steps, such as reducing its power, to cure this problem. The Commission must act immediately to prevent further harm to KRRI and its listeners.

Please contact the undersigned if additional information is required.

Yours truly,


Jerrold Miller

cc: Larry Eads, Chief, Audio Services Division
Eric Kravetz, Esq. (counsel for KRBO)



CHRONOLOGY OF EVENTS

Subject: Interference of KRRI-FM signal at 105.5 by KRBO-FM signal at 105.1.

Dates: 9/12/93 to 10/25/93: **Note:** All calls are UNSOLICITED. At no time in this period did KRRI-FM solicit listeners to call if they were experiencing any reception problems with 105.5.

Note: Complaint calls fall within KRRI-FM's 3.16 mV contour and within our 1.00 mV contour.

9/12/93 & 9/13/93: KRBO-FM began broadcasting on Sunday 9/12. DJ's on duty left notes indicating that numerous calls had been received from listeners upset by signal interference. The same thing happened on Monday, 9/13. KRRI was not aware at that time that KRBO had signed on. Listeners complained of: "Two commercials playing at the same time". Or, "You're playing 2 records". Or, "I can't pick you up anymore". Staff did not inquire further as they were not prepared to do so. Some listeners volunteered their locations at the

time of the complaint calls. Those recalled were: Around Macarran airport and at Sunset and Eastern. Est. # of calls received over both days: 30.

9/14: Salesmen at the KRRI-FM Sales Office at Tropicana and Eastern, Las Vegas, reported they no longer were able to receive the station on an in-office FM tuner where heretofore this had not occurred.

9/14: Listener Don Nuttal (702-452-1450) called to complain that his stereo was pre-set to 105.5 and suddenly he was able only to receive 105.1.

9/15: A Robert Farkas called in to report he lives at Maryland Parkway and Las Vegas Blvd. and cannot receive 105.5 any longer, that it had been replaced by 105.1.

9/15: A Kathy Seabold called from Eastern and Sunset Road. She told us she could no longer receive 105.5 because 105.1 came in over us.

9/16: A Heidi Butterfield called in from Westcliff and Buffalo. She said when she tunes us in, then walks away from the radio, 105.1 came in over us.

(more)

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CHRONOLOGY-CONTINUED

9/16: Employee Leigh Reid(702-566-6711) reported that 105.1 was bleeding over into our signal on the Boulder Hwy. between Henderson and Boulder City for approximately 2 long city blocks.

9/23: Bob Trayvor (702-364-8083) called in to say that at Tropicana Blvd. and Rainbow his auto stereo would not tune us in, that it scans and stops on 105.1. He stated that even manually he is no longer able to tune in 105.5.

9/24: Shawn Derrick (702-651-1034) called from Nellis AFB and said the 105.1 signal was running all over 105.5.

9/27: An unidentified caller said that at work, NW Decatur Blvd. and Washington, and at home, Rainbow and Washington, he could no longer receive 105.5 that we were being overpowered by 105.1.

9/28: Nevada Highway Patrol Officer Steve Harney called from NHP Headquarters at 2601. E. Sahara (702-385-0311) to complain about an anti-NHP editorial that we had assertedly aired. When we assured him no such editorial had aired, we asked him to check the radio at his office and call us back. He did and apologized and said he was now on 105.1 where we used to be.

9/28: Dave (no last name given) of a company called Distinctive Carpets (702-736-1035) called in to complain that he cannot get us anymore at his store which is located at Rainbow Blvd. and Sahara Blvd.

9/28: A Bob Burnham (702-363-9584) called to say he can no longer receive 105.5 on his home radio due to interference from 105.1. He lives in the area of Rainbow and Sahara Blvd's.

10/1: Tom Allen (702-733-7179) called to report that 105.1 cuts us off completely at his home and office: Paradise Road and Flamingo and Buffalo and Rainbow.

(more)

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CHRONOLOGY-CONTINUED

10/3: A Jackie Smith called to report interference of the 105.5 signal, where we used to be clean all the time, at the following locations: West Desert Inn Road & Sandhill Avenue and Pecos and Owens.

10/5: A Paula Dugan (702-870-4142) called to say that 105.1 was bleeding all over 105.5 on Charleston near Valley View.

10/6: Bob Wolf (702-877-2441) called in to say that he cannot tune in 105.5 very clearly anymore due to interference from 105.1 at U-S 95, the Cheyenne-Craig Road area of North Las Vegas.

10/6: Andrea Knapp called in from UNLV (702-895-3846) to say that 105.5 was no longer available to listeners on campus, nor could she hear us at her home in the Summerlin area anymore.

10/8: Listener Ruby Burgess (702-646-2864) called to say that she could no longer receive 105.5 on her home tuner. She lives in the area of Rainbow and Lake Mead Blvd.

10/13: A Penny Ingraham (702-875-4111) called in to say that 105.1 was all over 105.5 and she could no longer tune us in in the area of Blue Diamond-West.

10/14: A Steve Quint (702-384-5705) called in to say that he lives on N.12th Street in downtown Las Vegas and that 105.1 is constantly fading in over 105.5.

10/14: A Sandra Tinsley (702-382-9820) called in from Sahara and Las Vegas Blvd. to say that our signal, 105.5, now fades in and out due to 105.1 where we heretofore had been strong and loud.

10/25: A Mike Gerace (702-382-7735) called in to say that he can longer tune in 105.5 at the following locations: Casino Center Drive and Charleston and Desert Inn and Flamingo. He said 105.5 was overridden by 105.1.

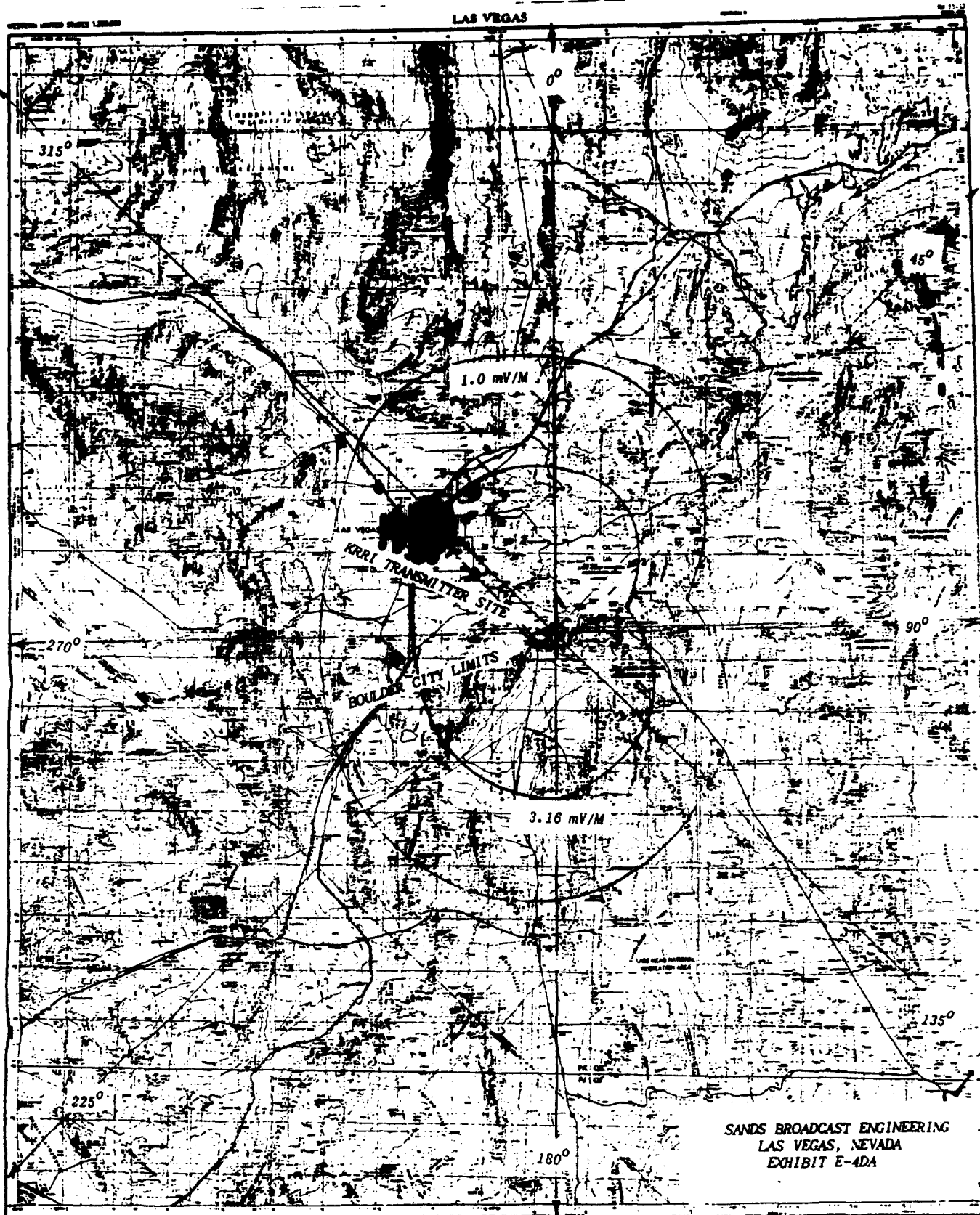
(more)

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CHRONOLOGY-CONTINUED

10/25: Linda Volkenburg (702-871-9222) called in to say 105.1 was running all over 105.5 at West Charleston and Rancho Drive.

-END-



SANDS BROADCAST ENGINEERING
LAS VEGAS, NEVEDA

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November 1, 1993

FM Spacing study

Title: KRRI
Channel 286C2 (105.1 MHz)
Database: DW 11/01/93

Latitude: 35-59-45
Longitude: 114-51-51
Safety zone: 65 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KDUC	LIC	FIRST AMERICAN COMMUNICA	232B1	4.60	34-58-15	240.6	227.8	17
BARSTOW	CA	BLH-911031KC	94.3	239	117-02-22	59.3	210.8	CLEAR
License Granted 06/26/92 per FCC release #21412 dated 07/01/92; Ant: Elec. Res								
. Inc. G5CPM-3E-SP; Affiliated with KSZL(AM)								
NEW	APP	KIMLER BROADCASTING, INC	233A	.49	33-36-22	217.7	332.9	15
TEMECULA	CA	BPH-900122MN	94.5	198	117-03-54	36.5	317.9	CLEAR
Amended 04/04/90; Received per FCC release #14662 dated 02/13/90, tendered per								
14731 dated 05/10/90, accepted per NA-126 dated 07/02/90; Initial Decision to								
Deny, adopted 07/09/93, released 07/19/93; Hearing DOC-91-309, adopted 11/15/								
91, released 11/25/91								
KZUL-FM CP	MAD DOG WIRELESS, INC.	283C2	1.05		34-33-06	159.0	171.4	58
LAKE HAVASU CITY	AZ	BPH-920727IB	104.5	814	114-11-37	339.4	113.4	CLEAR
CP Granted 01/14/93 per FCC release #21556 dated 01/15/93; ORDERED FROM 286C2;								
Was KNDD 05/23/86								
KDES-FM CP	TOURTELOT BROADCASTING C	284B	2		33-51-56	211.3	275.7	74
PALM SPRINGS	CA	BPH-881128IB	104.7	159	116-25-04	30.4	201.7	CLEAR
CP Granted 10/17/89; Affiliated with KDES(AM)								
KIQQ-FM CP	ENEIDA ORCHARD	285A	1.08		34-51-20	238.0	235.3	106
LENWOOD	CA	BMPH-910301IE	104.9	142	117-02-57	56.7	129.3	CLEAR
Deletion proposed; CP Granted 07/23/92 per FCC release #21435 dated 07/31/92;								
Was KIQQ 01/23/90 per FCC release #126 dated 01/26/90; Affiliated with KIQQ(AM)								
)								
KRBO	CP	PATMOR BROADCASTING GROU	286C2	50	36-20-00	310.2	58.34	190
LAS VEGAS	NV	BMPH-921210IH	105.1	11	115-21-41	129.9	-132	SHORT
CP Granted 01/29/93 per FCC release #21563 dated 02/04/93; Application for Lic								
ense (BLH-930914KA) accepted per FCC release #15642 dated 10/08/93; Call Gran								
ted 11/29/89; Ant: Harris FMH-6AC								
KZUL-FM LIC	MAD DOG WIRELESS, INC.	286C2	.28		34-32-54	159.1	171.8	190
LAKE HAVASU CITY	AZ	BLH-910124KC	105.1	1338	114-11-37	339.5	-18.2	SHORT
Deletion proposed; License Granted 10/16/91 per FCC release #21231 dated 10/21								
/91; ORDERED TO 283C2; Was KNDD 05/23/86; Ant: Jampro JSCP-3								
PRM	CLASS CHANGE FROM A PROP	287B1			35-01-39	235.5	188.0	134
YERMO	CA	DOC-93-74	105.3		116-33-51	54.5	53.95	CLEAR
PRM adopted 03/08/93, released 04/08/93; RM-8153; SITE RESTRICTION 17.1 MI NE								
KRRI	LIC	ROCK' N ROLL INCORPORATE	288C2	3.74	35-59-45	.0		58
BOULDER CITY	NV	BLH-890306KB	105.5	484	114-51-51	.0	-58	SHORT
KDUQ	CP	IST AMERICAN COMMUNICATI	289A	1.80	34-42-21	220.8	188.3	55
LUDLOW	CA	BPH-891206MJ	105.7	180	116-12-38	40.0	133.3	CLEAR
CP Granted 09/25/91 per FCC release #21218 dated 10/01/91; Was KEQF 04/01/92 p								
er FCC release #179 dated 03/27/92								

>> End of channel 286C2 study <<

SANDS BROADCAST ENGINEERING
LAS VEGAS, NEVEDA

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November 1, 1993

FM Spacing study

Title: KRBO
Channel 289C2 (105.7 MHz)
Database: DW 11/01/93

Latitude: 36-20-00
Longitude: 115-21-41
Safety zone: 65 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KBXY	CP	DESERT BROADCASTING, G.P	235B1	15.5	35-08-20	210.7	153.9	17
BAKER		CA BPH-911224MB	94.9	127	116-13-34	30.2	136.9	CLEAR
CP Granted 08/24/92 per FCC release #21455 dated 08/28/92; Was KWXW 12/28/92 p er FCC release #197 dated 12/28/92								
KFRG	LIC	AMATURO GROUP, LTD.	236B	50	34-11-51	216.9	294.7	20
SAN BERNARDINO		CA BLH-900808KB	95.1	149BT	117-17-10	35.8	274.7	CLEAR
License Granted 08/20/91 per FCC release #21439 dated 08/06/92; Was KQLH 12/03 /89								
KRBO	CP	PATMOR BROADCASTING GROU	286C2	50	36-20-00	.0		58
LAS VEGAS		NV BMPH-921210IH	105.1	11	115-21-41	.0	-58	SHORT
CP Granted 01/29/93 per FCC release #21563 dated 02/04/93; Application for Lic ense (BLH-930914KA) accepted per FCC release #15642 dated 10/08/93; Call Gran ted 11/29/89; Ant: Harris FMH-6AC								
PRM		CLASS CHANGE FROM A PROP	287B1		35-01-39	217.2	181.2	56
YERMO		CA DOC-93-74	105.3		116-33-51	36.5	125.2	CLEAR
PRM adopted 03/08/93, released 04/08/93; RM-8153; SITE RESTRICTION 17.1 MI NE								
KRRI	LIC	ROCK' N ROLL INCORPORATE	288C2	3.74	35-59-45	129.9	58.34	130
BOULDER CITY		NV BLH-890306KB	105.5	484	114-51-51	310.2	-71.7	SHORT
KDUQ	CP	IST AMERICAN COMMUNICATI	289A	1.80	34-42-21	203.3	196.3	166
LUDLOW		CA BPH-891206MJ	105.7	180	116-12-38	22.8	30.31	CLEAR
CP Granted 09/25/91 per FCC release #21218 dated 10/01/91; Was KEQF 04/01/92 p er FCC release #179 dated 03/27/92								
KRCY	LIC	HUALAPAI BROADCASTERS IN	290C1	8.50	35-01-58	147.8	170.1	158
KINGMAN		AZ BLH-901130KF	105.9	576BT	114-21-57	328.4	12.13	CLOSE
License Granted 02/28/92 per FCC release #21327 dated 03/05/92; Was KAWA 10/24 /89; Ant: Cablewave CFM HP-8								
KRCY	CP	HUALAPAI BROADCASTERS, I	290C1	17	35-01-58	147.8	170.1	158
KINGMAN		AZ BPH-910703IB	105.9	576	114-21-57	328.4	12.13	CLOSE
CP Granted 11/14/91 per FCC release #21257 dated 11/22/91; Was KAWA 10/24/89								
KPLM	LIC	R GROUP BROADCASTING COR	291B	50	33-52-14	196.3	284.4	74
PALM SPRINGS		CA BLH-830419AL	106.1	119	116-13-39	15.8	210.4	CLEAR
KDAY	CP	BENETT KESSLER	292A	3	36-50-00	283.1	263.4	55
INDEPENDENCE		CA BPH-880519MF	106.3	-492	118-14-17	101.4	208.4	CLEAR
Deletion proposed; CP Granted 03/14/91 per FCC release #21077 dated 03/23/91; ORDERED TO 223B; Call Granted 05/03/91 per FCC release #157 dated 05/03/91								

>> End of channel 289C2 study <<

CERTIFICATE OF SERVICE

I hereby certify that on this 3 day of November, 19
a copy of the foregoing document was placed in the United States
mail, first class postage prepaid, addressed to the following:

Eric S. Kravetz, Esq.
Brown Nietert & Kaufman, Chartered
1920 N Street, NW
Suite 660
Washington, DC 20036
(Attorney for KRBO)

Robin Queen